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February 25, 2020

By ECF:

The Honorable Kenneth M. Karas
Federal Building and United States Courthouse
300 Quarropas St.
White Plains, NY 10601

Re: *Russett, et al. v. Northwestern Mutual Life Insurance Company*,
Case No. 7:19-cv-07414-KMK (S.D.N.Y.)

Dear Judge Karas:

The undersigned represent Plaintiffs Elizabeth Russett, Beth Calabrese, and Jan Bullard and Defendant The Northwestern Mutual Life Insurance Company in the above-referenced matter. We write to inform the Court that the parties have reached agreement on all material terms of a class action settlement. Accordingly, the parties request that the Court enter an order staying all upcoming deadlines, including the deadlines to respond to the Complaint and to participate in the scheduled Rule 16 conference. The Parties will work promptly to complete and execute a Class Action Settlement Agreement, and Plaintiff intends to file a motion for preliminary approval of the proposed settlement shortly thereafter.

Very truly yours,

/s/ Philip L. Fraietta

Philip L. Fraietta, Plaintiffs' Counsel

/s/ Timothy J. O'Driscoll

Timothy J. O'Driscoll, Defendant's Counsel

CC: All counsel of record (via ECF)

Granted
See Order.
[Signature]
2/25/20